

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RAVIDATH LAWRENCE RAGBIR; )  
)  
NEW SANCTUARY COALITION OF )  
NEW YORK CITY; )  
)  
CASA DE MARYLAND, INC.; )  
)  
DETENTION WATCH NETWORK; )  
)  
NATIONAL IMMIGRATION PROJECT )  
OF THE NATIONAL LAWYERS GUILD; )  
)  
and )  
)  
NEW YORK IMMIGRATION )  
COALITION, )  
)  
Plaintiffs, )  
)  
v. )  
)  
THOMAS D. HOMAN, in his official )  
capacity as Deputy Director and Senior )  
Official Performing the Duties of the )  
Director of U.S. Immigration and Customs )  
Enforcement; )  
)  
THOMAS R. DECKER, in his official )  
capacity as New York Field Office Director )  
for U.S. Immigration and Customs )  
Enforcement; )  
)  
SCOTT MECHKOWSKI, in his official )  
capacity as Assistant New York Field Office )  
Director for U.S. Immigration and Customs )  
Enforcement; )  
)  
U.S. IMMIGRATION AND CUSTOMS )  
ENFORCEMENT; )  
)

**18 CV 01159**

Civil Action No. \_\_\_\_\_

KIRSTJEN M. NIELSEN, in her official )  
capacity as Secretary of Homeland Security; )  
)  
U.S. DEPARTMENT OF )  
HOMELAND SECURITY; )  
)  
JEFFERSON B. SESSIONS III, in his )  
official capacity as Attorney General of the )  
United States; )  
)  
and )  
)  
U.S. DEPARTMENT OF JUSTICE, )  
)  
Defendants. )  
\_\_\_\_\_ )

### STIPULATED ORDER

WHEREAS, Plaintiff Ravidath Ragbir, pursuant to the Continuation Page for his Form I-220B Order of Supervision dated January 29, 2018 (the “I-220B Continuation Page”), has been ordered to report to 26 Federal Plaza, New York, New York, on Saturday, February 10, 2018 at 10:00 a.m., for removal from the United States; and

WHEREAS, Plaintiffs, including Ravidath Ragbir, have filed a Verified Complaint in the above-captioned matter alleging retaliation in violation of the First Amendment and content, viewpoint, and speaker discrimination in violation of the First Amendment; and

WHEREAS, in lieu of Plaintiffs today filing an Order to Show Cause and seeking a Temporary Restraining Order, all parties instead have agreed to a stay of Plaintiff Ravidath Ragbir’s removal pending resolution of a motion for a preliminary injunction, as set forth below.

It is hereby STIPULATED, AGREED, and ORDERED that:

1. Pending resolution by this Court of Plaintiffs’ Motion for a Preliminary Injunction, Plaintiff Ravidath Ragbir’s removal from the United States is STAYED;

2. The stay described in the preceding paragraph remains in effect notwithstanding the I-220B Continuation Page, ordering Plaintiff Ravidath Ragbir to report to 26 Federal Plaza, New York, New York, on Saturday, February 10, 2018, at 10:00 a.m. for removal;

3. Plaintiff Ravidath Ragbir will report to 26 Federal Plaza, New York, New York, on Saturday, February 10, 2018, at 10:00 a.m. in accordance with the I-220B Continuation Page, at which time Mr. Ragbir will not be removed from the United States, detained, or subjected to any additional conditions of supervision;

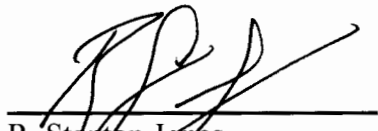
4. Plaintiffs shall file their Motion for a Preliminary Injunction on or before Monday, February 12, 2018; Defendants shall file a response on or before Thursday, March 1, 2018; and Plaintiffs shall file a reply brief on or before Wednesday, March 14, 2018;

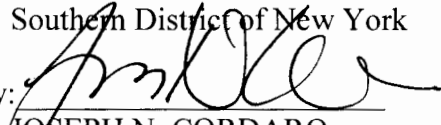
*[The rest of this page is intentionally left blank]*

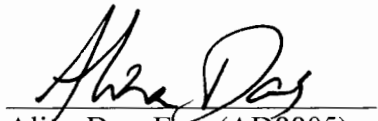
5. The parties have entered into this Stipulation in order to resolve Plaintiffs' proposed Order to Show Cause seeking a Temporary Restraining Order. Nothing in this Stipulation shall be construed as an admission by the parties of wrongdoing, a concession of any rights by the parties, or a concession of any factual or legal arguments by the parties;

New York, New York  
Dated: February 8, 2018

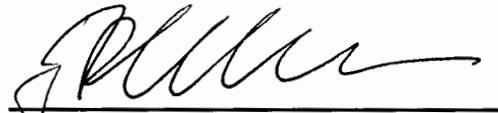
SO STIPULATED AND AGREED:

  
R. Stanton Jones  
ARNOLD & PORTER  
KAYE SCHOLER LLP  
601 Massachusetts Ave., NW  
Washington, DC 20001  
(202) 942-5000  
(202) 942-5999 (fax)  
stanton.jones@arnoldporter.com  
*Counsel for Plaintiffs*

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York  
By:   
JOSEPH N. CORDARO  
BRANDON M. WATERMAN  
Assistant United States Attorneys  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (212) 637-2745, 2741  
Facsimile: (212) 637-2786  
Email: joseph.cordaro@usdoj.gov  
brandon.waterman@usdoj.gov

  
Alina Das, Esq. (AD8805)  
WASHINGTON SQUARE  
LEGAL SERVICES, INC.  
Immigrant Rights Clinic  
New York University School of Law  
245 Sullivan Street, 5th floor  
New York, New York 10012  
Tel: (212) 998-6430  
alina.das@nyu.edu  
*Counsel for Plaintiff*

SO ORDERED:

 2/8/18  
United States District Judge  
Part I